

Kathleen Greenan Ramsey  
202.408.6345  
kramsey@sonnenschein.com

February 6, 2006

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060  
EB Docket No. 06-36  
Certification of CPNI Filing (February 6, 2006)**

Dear Secretary Dortch,

Pursuant to the Commission's Public Notice released on January 30, 2006, attached is the annual certification of Value-Added Communications, Inc. in compliance with section 64.2009(e) of the Commission's rules, 47 C.F.R. §64.2009(e).

If you have any questions, please do not hesitate to contact the undersigned.

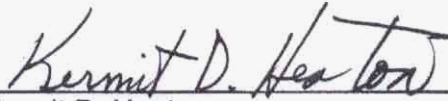
Sincerely,



Kathleen Greenan Ramsey

**VALUE-ADDED COMMUNICATIONS, INC.  
ANNUAL SECTION 64.2009(e) CERTIFICATION**

I, Kermit D. Heaton, a duly authorized officer of Value-Added Communications, Inc. ("VAC"), hereby certify on behalf of VAC, that I have personal knowledge that the Company has operating procedures as described in the attached statement that to the best of my knowledge, information and belief are adequate to ensure compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.

A handwritten signature in dark ink, reading "Kermit D. Heaton", is written over a horizontal line.

Kermit D. Heaton  
Executive Vice President  
Value-Added Communications, Inc.  
February 6, 2006

**STATEMENT REGARDING OPERATING PROCEDURES  
IMPLEMENTING 47 C.F.R. SUBPART U  
GOVERNING USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

The following statement explains the internal procedures of Value-Added Communications, Inc. ("VACI") to ensure that it is in compliance with the Commission's CPNI rules.

VACI provides telecommunications services to inmates in local, state, and federal prison facilities. As part of those inmate services, VACI may provide interstate and/or international long distance services, as well as local and intraLATA toll services. VACI only provides these services to inmates via contractual arrangements with the various prison administrations (Subcontracts), such as police departments, Sheriff's departments, state Departments of Correction (DOC), and the Federal Bureau of Prisons (FBOP).

A large part of VACI's business is made up of its Subcontract with the FBOP. Under the FBOP Subcontract and a number of other VACI correctional contracts, the customer data is the property of the government agency administering the prisons. Thus, VACI is not permitted to access this information for marketing purposes and, in fact, follows several protocols to protect such information on behalf of the correctional facility. As part of the FBOP Subcontract, VACI must comply with certain security standards for customer data applicable to government contractors, such as the following:

- *National Institute of Standards and Technology* – NIST Special Publication 800-53 Information Security
- *Federal Information Technology Security Policy* – OMB Circular A-130 management of Federal Information Resources
- *Department of Justice Program (DOJ) Management Policy* – DOJ 2640.2D Information Technology Security

Because a large part of VACI's business is made up of its Subcontract with FBOP, the processes, procedures, and physical hardware to comply with the above government security standards are also used in connection with VACI's protection and handling of customer data. Some key aspects of VACI's customer data security are:

- *Need to Know* – VACI only allows employee access to customer information on a need-to-know basis. All of VACI's employees who deal with 'customer' data must take and pass a federal background check as administered through the Department of Justice.
- *Physical Security* – VACI maintains a single physically secure facility for the storage of all customer data. Customer data is also maintained for



each prison facility inside the prison itself, each prison having its own but effective physical security.

- *Computer Security* – VACI maintains a secure data infrastructure accessible by authorized personnel only.
- *Network Security* – VACI maintains a NIST compliant data network infrastructure.
- *No Marketing* - VACI does not use any of the customer data for any marketing or sales purposes. While most of the customer data is not owned or handled by VACI, what little customer data VACI does handle is not, and is not planned to be, used for any marketing or sales purpose.

VACI's operating procedures are designed to ensure consumer information is protected in compliance with section 222 of the Communications Act. Further, in light of VACI's status as a government contractor, the Company also institutes a number of strict information security measures designed to comply with the aforementioned government imposed standards and provide a high level of security for customer data.

VACI uses CPNI internally for the purpose of providing telecommunications services. VACI also uses CPNI internally for the following actions:

- (1) to bill and collect for services rendered;
- (2) to provision installation, maintenance, and repair services; and
- (3) to protect the rights or property of VACI, or to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, VACI's services.
- (4.) to provide investigative data for the prison governmental administration in their investigative and security responsibilities over the inmates and prisons in question.

VACI procedures require that CPNI be used only for the purposes identified above. Customer approval is not required for these uses of CPNI as they are specifically permitted under the statute or by Commission rule.

The security of customer information is of paramount importance to VACI. The use of such information is supervised by an officer of the Company and VACI employees are trained to secure CPNI and related confidential information. VACI does not sell CPNI to third parties.